

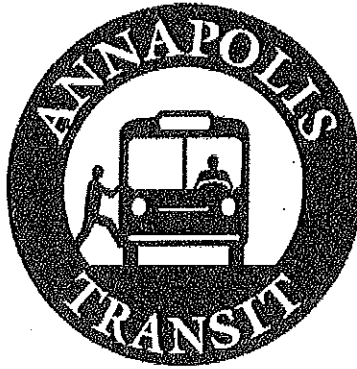
**TITLE VI**  
**2015 – 2017 IMPLEMENTATION PLAN**  
**TITLE VI OF THE CIVIL RIGHTS ACT OF 1964**

**CITY OF ANNAPOLIS**  
**DEPARTMENT OF TRANSPORTATION**



Adopted date

June 26, 2015



## TABLE OF CONTENTS

### CHAPTER

- I. Introduction
- II. Overview of Services
- III. Policy Statement and Authorities
- IV. Annual Nondiscrimination Assurance to MTA
- V. Plan Approval Document
- VI. Organization and Title VI Program Responsibilities

### VII. GENERAL REPORTING REQUIREMENTS

Requirement to Provide a Title VI Notice to the Public

Requirement to Provide a Title VI Complaint Procedures

Requirement to Provide a Title VI Complaint Form

Requirement to Provide Title VI Investigations, Complaints and or Lawsuits Filed

Requirement to Provide Public Outreach and Involvement Activities

Requirement to Provide Access for Limited English Proficient (LEP) Persons

Representation on Planning and Advisory Boards in Addition to Outreach Efforts

VIII. **REQUIREMENTS OF TRANSIT PROVIDERS**

**Service Standards** (Vehicle load, Vehicle headway, On-time performance, Service availability)

**Service Policies** (Transit amenities, Vehicle assignment)

IX. APPENDICES

- A Title VI Notice to the Public; List of Locations
- B Title VI Complaint Form
- C Investigations, Lawsuits and Complaints Document
- D Summary of Outreach Efforts
- E LAP Plan
- F Table – Minority Representation on Committees by Race
- G Title VI System-wide Standards and Policies

## **1. INTRODUCTION**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Annapolis Department of Transportation (which operates Annapolis Transit) incorporates nondiscrimination policies and practices in providing services to the public.

## **I. OVERVIEW OF SERVICES**

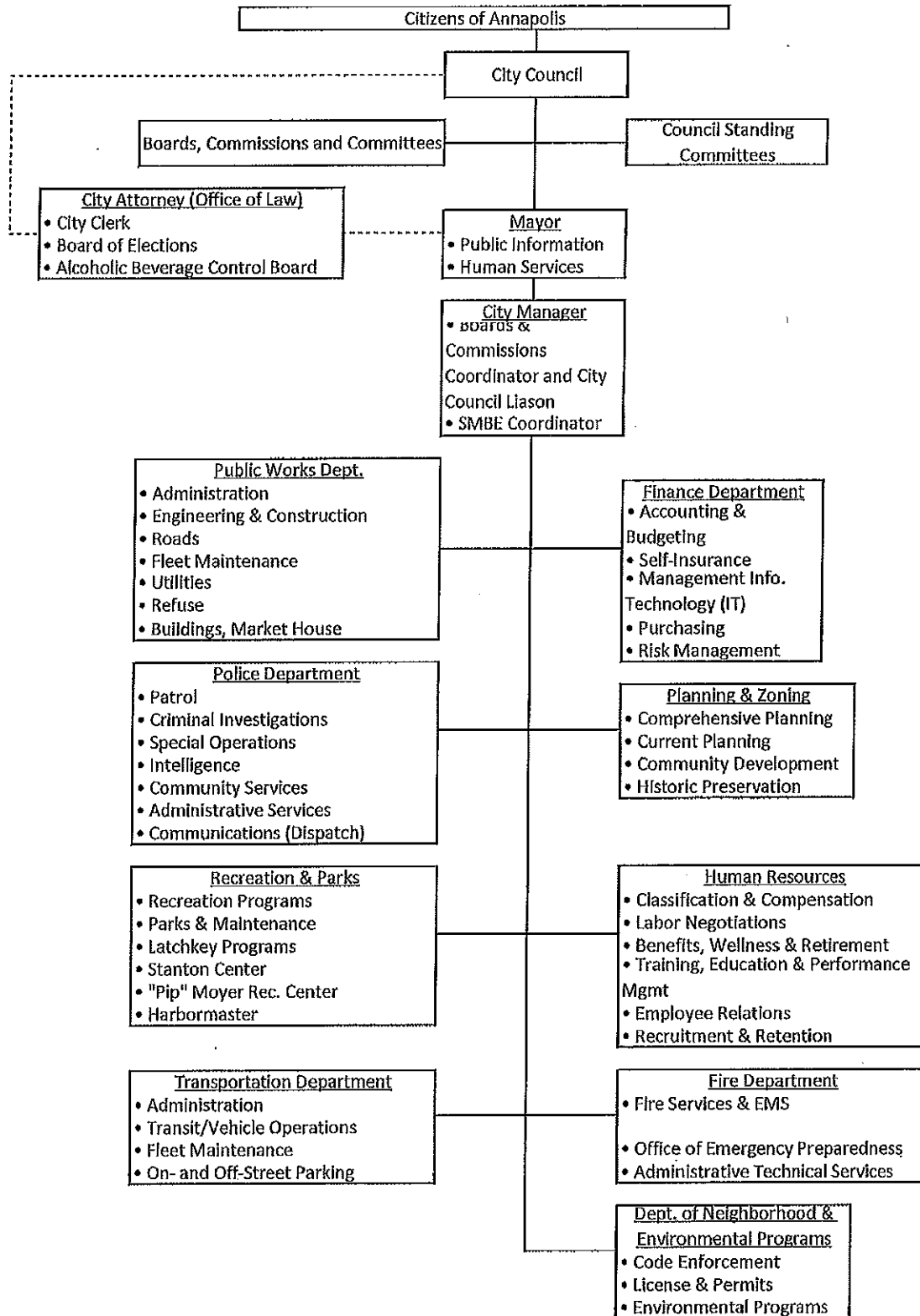
Annapolis Department of Transportation (ADOT) is part of the City of Annapolis Government (see Government Organizational Chart). ADOT operates Annapolis Transit, is committed to providing the highest possible level of reliable, safe, affordable, convenient and accessible public transportation services to all the people who visit, live and work in its service area. The public transportation services are provided through regular fixed route (connectors), shuttle and demand-response, ADA complementary paratransit services.

The connectors consist of the following fixed routes: Red, Yellow, Green, Orange, Gold and Purple. The shuttle services are provided through the Circulator and State Shuttle. The headways on the connectors are 30 minutes except the Brown, Purple and Gold routes which have 45, 75 and 120 minutes respectively. ADOT runs a reduced service on weekday evenings, Saturdays and Sundays. Weekday span of service is 5:30 a.m. to 11:00 p.m.; Saturday from 7:15 a.m. to 8:00 p.m., and on Sunday from 7:00 am to 8:00 p.m.

The ADA complementary paratransit is a specialized, origin to destination service for people with disabilities who are not able to ride fixed-route public transportation and live within  $\frac{3}{4}$  mile on each side of each fixed route. The ADA complementary paratransit service is not a general purpose demand response service.

The service area is about 23 square miles including the City of Annapolis and surrounding Anne Arundel County areas, from Bay Forest Plaza in the east to Gateway Village and Annapolis Mall in the west; and Sojourner Douglas College in Edgewater in the south to Anne Arundel Community College in Arnold in the north.

## **City of Annapolis Government Organization Chart**

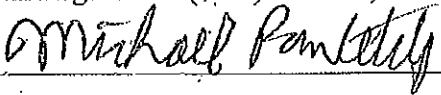


### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

Annapolis Department of Transportation (ADOT) is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Annapolis Transit's Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.



06-26-2015

Signature of Authorizing Official

Date

#### Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, "U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations," (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

ATTEST:



Regina C. Watkins-Eldridge, MMC (Seal)

City Clerk



## II. NONDISCRIMINATION ASSURANCES TO MTA

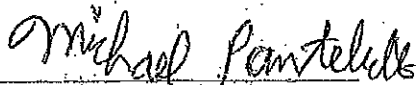
In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Maryland Transit Administration (MTA) submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, Annapolis Transit submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting the assurance, Annapolis Department of Transportation confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

## III. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Annapolis Department of Transportation Title VI Implementation Plan 2014-2017. I have reviewed and approved the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of City of Annapolis' transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Michael Pantelides, Mayor



DATE

CITY OF ANNAPOLIS  
ATTEST:



Regina C. Watkins-Eldridge, MMC (Seal)

Attest: ~~Mayor of Annapolis City Council Resolution~~

#### **IV. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

Under the authority of the City of Annapolis, the Director of the Annapolis Department of Transportation or his/her designee will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

##### **Overall Organization for Title VI**

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

##### **Title VI Manager Responsibilities**

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

### **General Title VI responsibilities of the agency**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

#### **1. Data collection**

To ensure that Title VI reporting requirements are met, Annapolis Department of Transportation will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

#### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, Annapolis Department of Transportation is required to submit a Quarterly Report Log to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. Annapolis Department of Transportation will also maintain and provide to the MTA on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

### **3. Annual review of Title VI program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

### **4. Dissemination of information related to the Title VI program**

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

### **5. Resolution of complaints**

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Annapolis Department of Transportation will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to MTA.

### **6. Written policies and procedures**

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

### **7. Internal education**

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

**Title VI training is the responsibility of the following individuals in the Annapolis Department of Transportation: Director, Senior Transportation Planner and/or Transit Operations Manager.**

## **8. Title VI clauses in contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), the Annapolis Department of Transportation's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the City of Annapolis' Procurement Officer and Purchasers who are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

## **VII. GENERAL REPORTING REQUIREMENTS**

### **REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Annapolis Department of Transportation shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc

**Annapolis Department of Transportation's Title VI Notice to the Public Notice and List of Locations are found in Appendix A.**

## **TITLE VI COMPLAINT PROCEDURES**

### **REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), Annapolis Department of Transportation shall develop procedures for investigating and tracking Title VI complaints filed against it and make the procedures for filing a complaint available to members of the public. Annapolis Department of Transportation has also developed a Title VI complaint form. The form and procedure for filing a complaint shall be available on the City of Annapolis' website and at its Department of Transportation facility.

Any individual may exercise his or her right to file a complaint with Annapolis Department of Transportation if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints

locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

**A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.**

**Annapolis Department of Transportation** includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

*Annapolis Department of Transportation is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B.*

*If you believe you have been subjected to unequal treatment because of race, color, religion, sex, age, or national origin, then you have the right to file a formal complaint. Complaints may be filed within one hundred-eighty (180) days following the date of the alleged discriminatory action. To file a complaint, or for additional information, contact:*

*Director, Department of Transportation, City of Annapolis  
308 Chinquapin Round Road, Annapolis, MD 21401  
Phone: 410-263-7964      Email: [transit@annapolis.gov](mailto:transit@annapolis.gov)*

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within Annapolis Transit's bus schedules.

**A copy of Annapolis Department of Transportation's Title VI Complaint Form is attached as Appendix B.**

### **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits**

Should any Title VI investigations be initiated by FTA or MTA, or any Title VI lawsuits are filed against Annapolis Department of Transportation, the department will follow these procedures:

## Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager.

The complaint is to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint should include:
    - the complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
    - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
    - a description of the alleged act of discrimination
    - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
    - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
    - if known, the names and/or job titles of those individuals perceived as parties in the incident
    - contact information for any witnesses
    - indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)
  - c. The complaint shall be submitted to the Title VI Manager at 308 Chinquapin Round Road, Annapolis, MD 21601 and/or [transit@annapolis.gov](mailto:transit@annapolis.gov).
  - d. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
    - a. notify MTA (no later than 3 business days from receipt)
    - b. notify Annapolis Department of Transportation Authorizing Official
    - c. ensure that the complaint is entered in the complaint database.
  3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
  4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
  5. If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
  6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.

7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
  - a. investigating contractor operating records, policies or procedures
  - b. reviewing routes, schedules, and fare policies
  - c. reviewing operating policies and procedures
  - d. reviewing scheduling and dispatch records
  - e. observing behavior of the individual whose actions were cited in the complaint.
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MTA, and if appropriate our legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.
13. A complaint may be dismissed for the following reasons:
  - a. the complainant requests the withdrawal of the complaint
  - b. an interview cannot be scheduled with the complainant after reasonable attempts
  - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint

## **TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

### **Background**

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.



This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

**A copy of Investigations, Lawsuits and Complaints Document is attached as Appendix C.**

## **PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Annapolis Department of Transportation utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English. These efforts are explained in the attached LAP Plan.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Annapolis Department of Transportation established a public participation plan or process that determines how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. These efforts are explained in the Summary of Outreach Efforts, Appendix D, and the LAP Plan, Appendix E.

To ensure full and fair participation, the City of Annapolis uses the several methods to solicit public input in the planning process, be it transit service and/or fare changes, Annual Transportation Plans (ATP), Transit Development Plan (TDP) or any changes to the transit system. (See Appendix D)

Public meetings are held in convenient locations that are accessible by public transportation such as Annapolis City Hall and Annapolis Department of Recreation and Parks. Sometimes, the meeting is held as part of a neighborhood association meeting. These meetings are usually held in the evenings to enable those who work during the day to attend.

Informal meetings are also held with advocacy groups such as Center of Help (for the Hispanic community) and Arundel Lodge (caters for disabled population).

Different formats are employed including PowerPoint presentations, hand-outs, and comments sheet. Contact information (e.g. email and physical addresses and phone number) is given out to the public for any additional comments and/or follow-ups.

Annapolis Department of Transportation will make these determinations based on a demographic analysis of the population(s) affected (Figure E-2), the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

**A Summary of Outreach Efforts is found in Appendix D.**

## **ACCESS FOR LIMIED ENGLISH PROFICIENT (LEP) PERSONS**

### **Introduction and Legal Basis**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Annapolis Department of Transportation is based on FTA guidelines.

As required, Annapolis Department of Transportation developed a written Language Assistance Plan (APPENDIX E). Using 2010 and American Community Survey (ACS) Census data, Annapolis Department of Transportation has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

## MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

City of Annapolis has transit-related, non-elected transportation board as established by City of Annapolis, Code of Ordinance, Article X, section 2.48.320:

A. For the purposes of this section, the term "transportation" includes all aspects of "transportation" including, but not limited to, parking of motor vehicles on City streets and in City-owned parking facilities.

B. Established—Duties. There is created a Transportation Board. The duties of the Board are: to provide informed analysis of the facts relating to transportation matters affecting the City and all transportation matters pending before the City Council or before any City agency, board or commission; to recommend to the Mayor and City Council, a comprehensive transportation master plan for the City; to provide oversight, guidance, and expertise in the planning of comprehensive traffic, transit, and parking policies. In performing its functions, the Board shall:

1. Study, review and make recommendations with respect to all transportation and traffic matters, including policies, laws, and regulations;
2. Advise the City Council on the implementation of the transportation master plan and improvement of City transportation and traffic conditions;
3. Provide a forum for citizens and residents to express their views and opinions regarding transportation, traffic policies and procedures and to inform the public with respect to proposals for changes in existing transportation and traffic policies and procedures;
4. Assist the City in the presentation of reports, recommendations, analysis, or policies to other public or quasi-public bodies whose actions may impact transportation conditions within the City; and
5. Participate in activities with Anne Arundel County and the State of Maryland intended to further the transportation concerns of the City.
6. Perform such other duties as directed by the Mayor or City Council.

#### C. Composition and Procedures.

1. The Board shall consist of fifteen members, eight City of Annapolis residents (one from each ward), two ad hoc members as defined in C.1.B., and five appointed at-large, who shall be appointed by the Mayor and confirmed by the City Council for a term of three years, commencing on July 1st of the year in which appointed. The appointment shall designate the term of each member of the board so that the terms of not more than five members of the board shall expire in any one year.

a. If a ward-specific position on the Board vacated on June 30 of any year is not filled by October 1 of the same year or is vacated after a term has commenced and the position is not filled after being vacant for three months, the Mayor and City Council shall no longer be required to adhere to the ward requirement. The position may then be filled by a City resident living in any ward and shall be considered an at-large member. The new at-large member shall serve for the duration of the term. When the position is vacated, it shall be return to being ward-specific.

b. The Board shall include in its membership a representative from the United States Naval Academy and St. John's College.

2. Each member shall have a demonstrated interest or expertise in transportation, parking, or traffic. At least two of the members shall possess professional or academic training in one or more of the above listed disciplines.

3. The Board shall annually select, from among its duly appointed members, officers of at least a chairperson, vice chairperson, and a secretary, whose authority shall be that prescribed in the current edition of Robert's Rules of Order, Newly Revised.

4. The Board shall, under its own authority, establish rules of procedure and practice to provide for the carrying out of its duties and responsibilities consistent with the provisions of this chapter.

5. The Director of Transportation, the Director of Planning and Zoning, the Director of Public Works and a representative from the State of Maryland shall be ex officio, non-voting members of the Board. The Mayor may designate additional City officials or individuals to participate in an ex officio, non-voting capacity.

#### D. Reports and Decisions.

1. A recommendation, or action of the Board shall be adopted only upon a majority of the members present and voting, a quorum of eight being necessary to conduct its business and shall be based upon publicly available information, statistics, or data.

2. A report, delineating the basis therefore, shall be rendered for each recommendation or action.

3. Each report shall be delivered to the City Council for its consideration.

4. The Board shall render an annual report to be received by the City Council not later than February 1st of the year following the year being reported. The report shall review the status of transportation and traffic affecting the City, and shall summarize all actions of the Council and Board taken during the calendar year past. The report shall delineate current difficulties, identify upcoming problems and view pending matters. The transportation master plan shall be reviewed, and the Board shall recommend necessary plans, studies, actions and expenditures for the following year to accomplish the objectives of the plan. The Board shall, as part of its annual report, notify the Council of any and all trends and developments which are becoming, or will become, a significant transportation concern of the City, whether or not a particular matter is physically located within the corporate borders of the municipality.

## **VIII. REQUIREMENTS OF TRANSIT PROVIDERS**

### **REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS**

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

#### **REQUIRED: Service Standards and Policies**

- **Service Standards**
  - Vehicle load, Vehicle headway, On-time performance, Service availability
- **Service Policies**
  - Transit amenities, Vehicle assignment

Annapolis Department of Transportation is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population. Annapolis Department of Transportation has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons (Figures E-1, E-2, E-3 and E-4).

### **Service Standards**

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that that distribution affords users equitable access to these services. The agency's demand responsive services are available to all callers on a first-come first service basis, without regard for race, color or national origin.

ADOT's System-wide Service Standards and Policies (Appendix G) are used to guard against service design or operations decisions from having disparate impacts. All of Annapolis Department of Transportation's services meet the agency's established standards; thus it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

### **Monitoring Title VI Complaints**

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the annual grant application (ATP) for submission to the MTA.

### **Fare and Service Changes**

Annapolis Department of Transportation (ADOT) follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, ADOT considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service

## **IX. FIGURES**

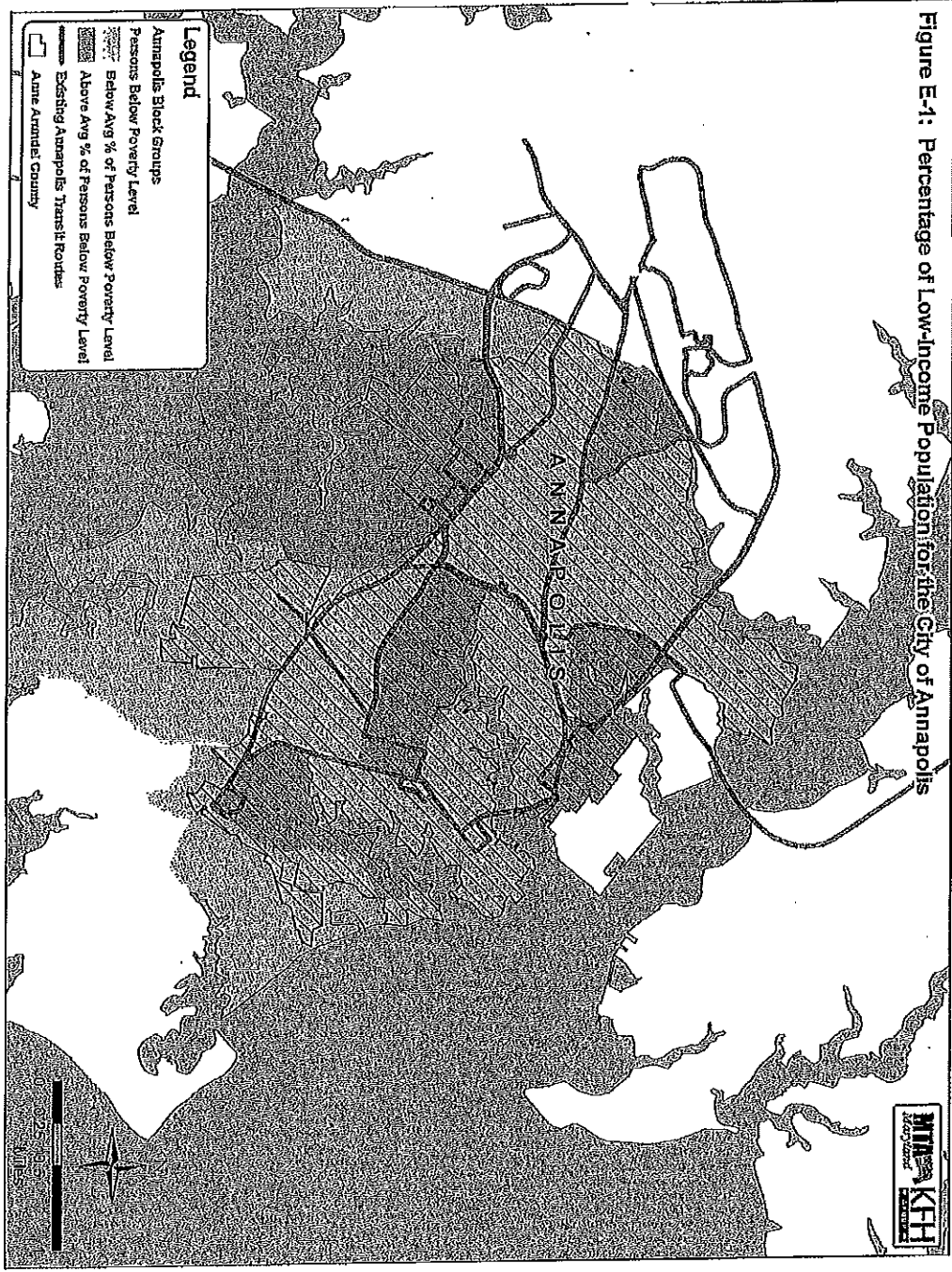
Figure E-1: Percentage of Low Income Population for the City of Annapolis

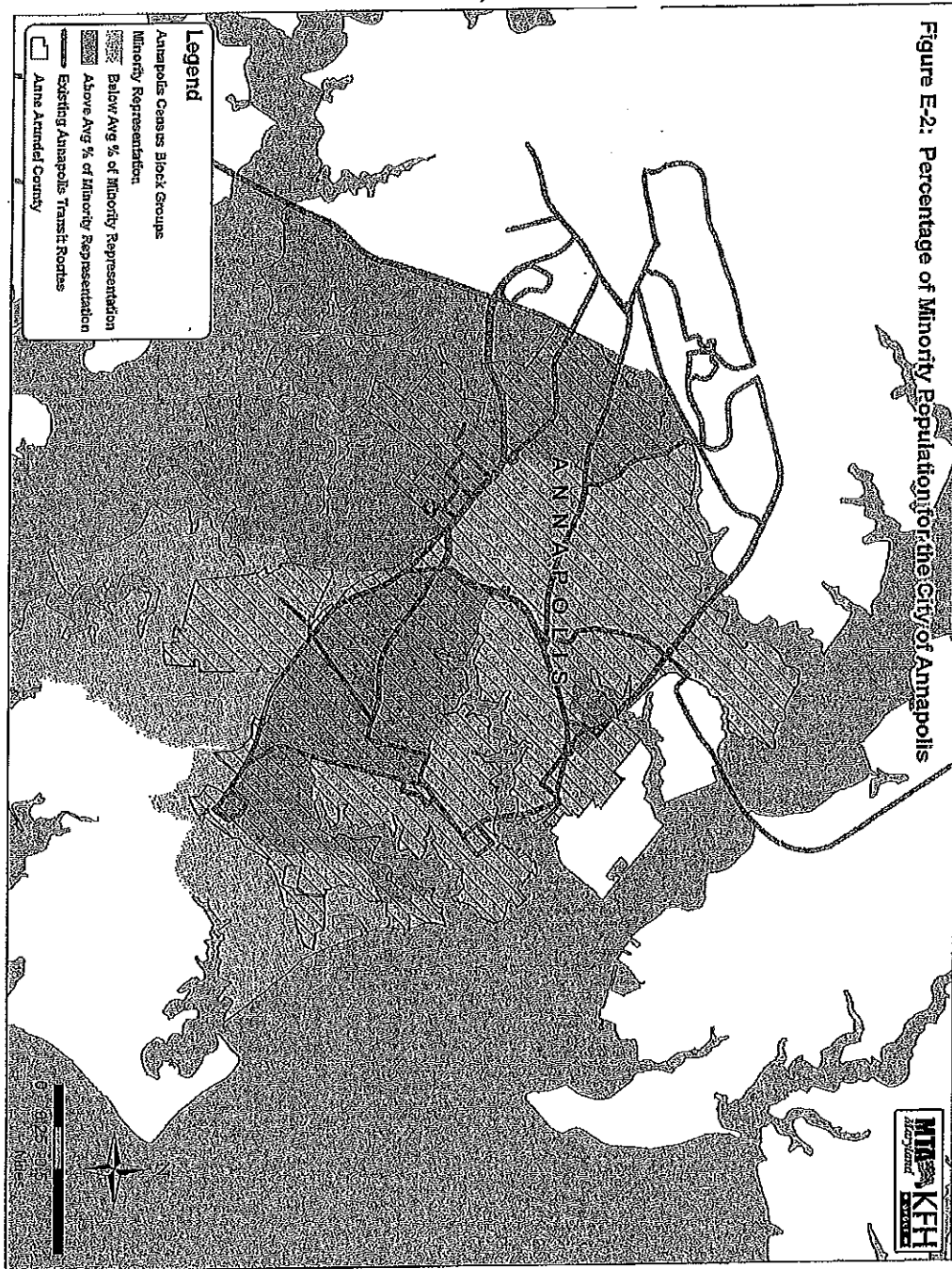
Figure E-2: Percentage of Minority Population for the City of Annapolis

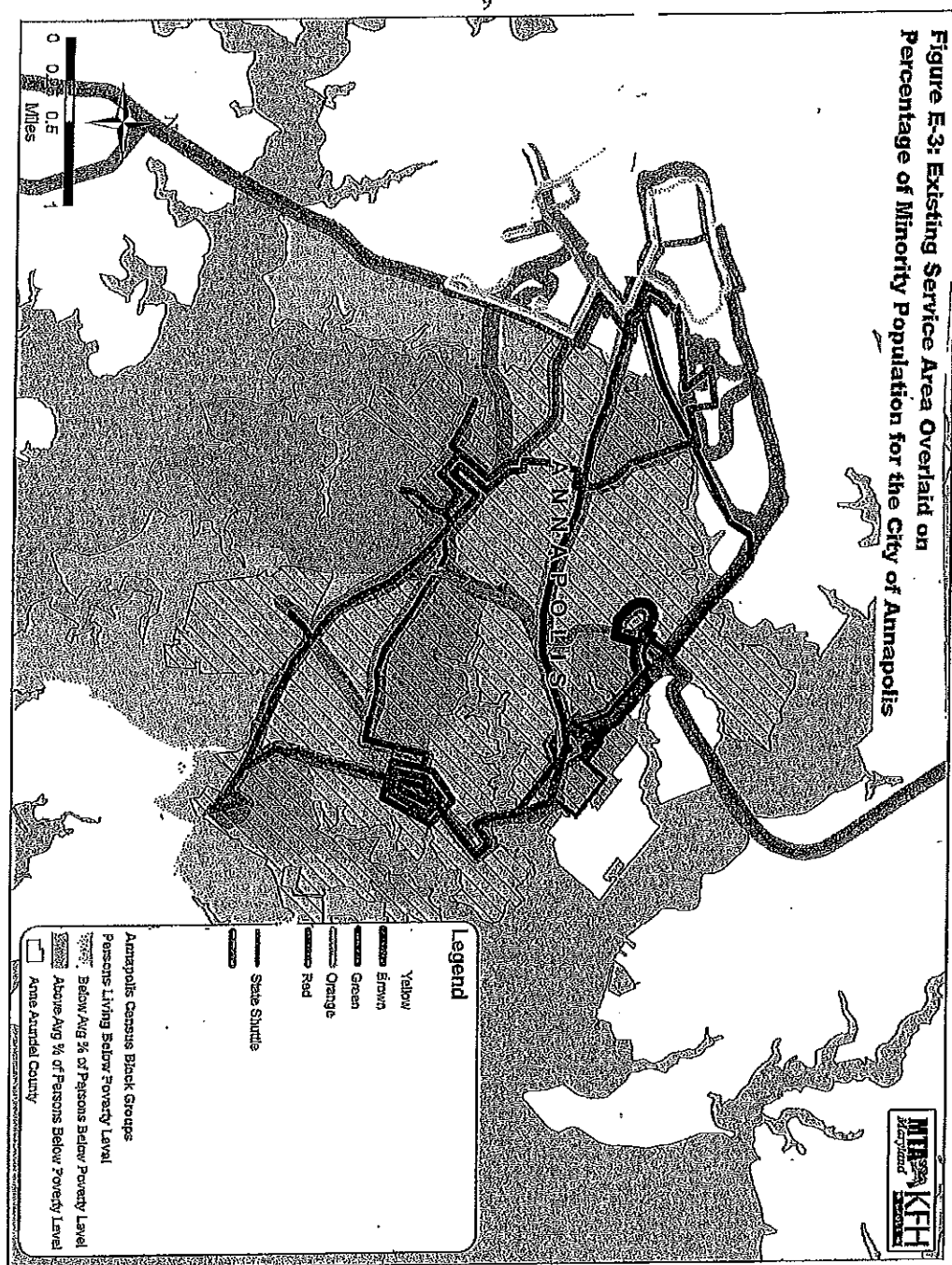
Figure E-3: Existing Service Area Overlaid on Percentage of Minority Population for the City of Annapolis

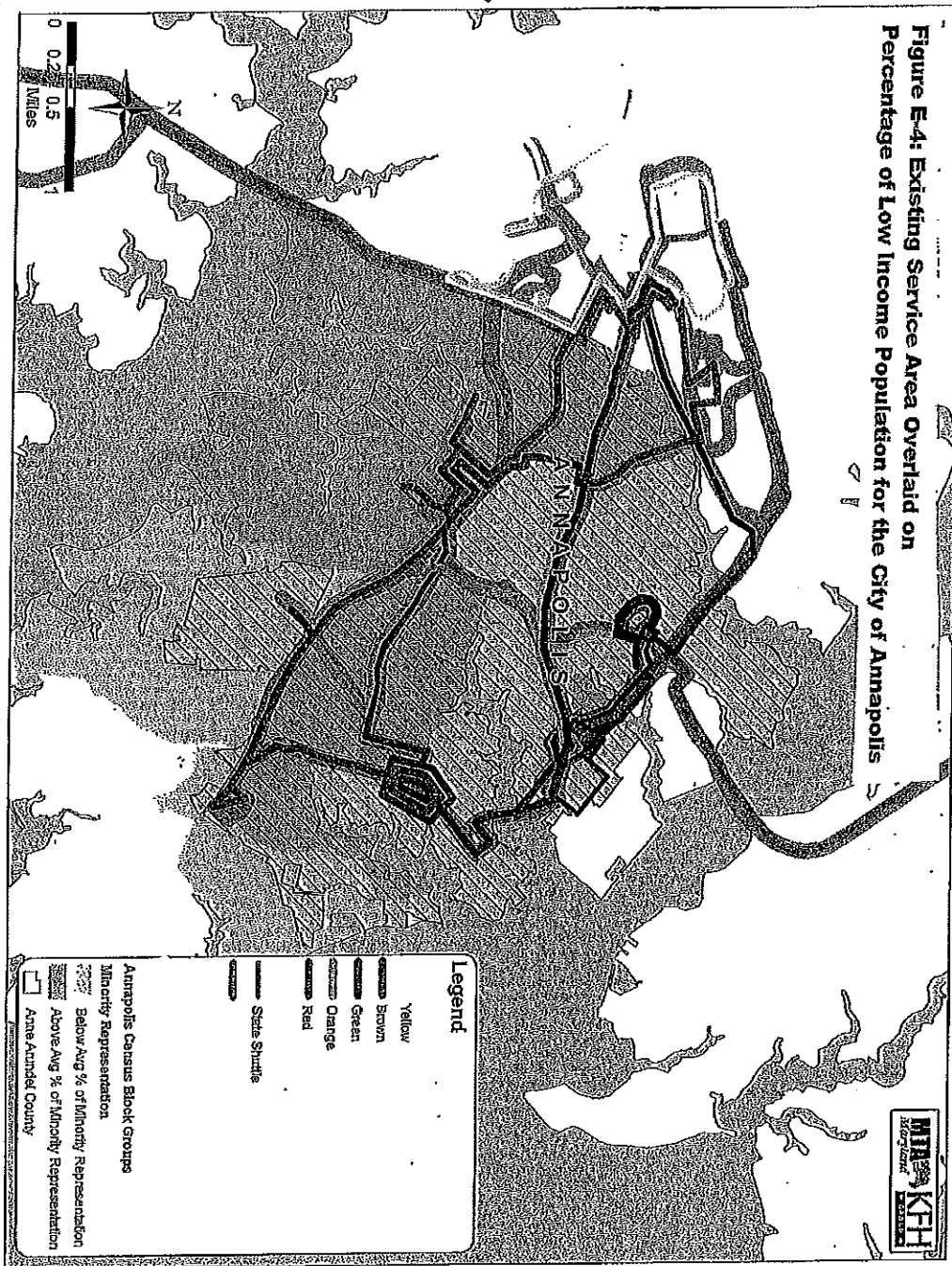
Figure E-4: Existing Service Area Overlaid on Percentage of Low Income Population for the City of Annapolis











## **X. APPENDICES**

## APPENDIX A

### Title VI Notice to the Public; List of Locations

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

**City of Annapolis Department of Transportation** is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you need further information or feel you are being denied participation in or being denied benefits of the transit services provided by the City of Annapolis Department of Transportation, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Director  
City of Annapolis Department of Transportation  
308 Chinquapin Round Road  
Annapolis, MD 21401  
Phone: 410-263-7974  
Email: [transit@annapolis.gov](mailto:transit@annapolis.gov)

#### List of Locations

1. City of Annapolis website: <http://www.annapolis.gov/government/city-departments/transportation>
2. Annapolis Transit Buses
3. Anne Arundel County Public Libraries in the service area
4. Annapolis City Hall
5. City of Annapolis Department of Recreation & Parks
6. Annapolis Visitors Center

## **APPENDIX B - Title VI Complaint Form**



**City of Annapolis**  
 Transportation Department  
 308 Chinquapin Round Road  
 Annapolis, MD 21401-4007



[Transit@annapolis.gov](mailto:Transit@annapolis.gov) • 410-263-7964 • Fax 410-269-5989 • TDD use MD Relay or 711 • [www.annapolis.gov](http://www.annapolis.gov)

## Title VI Complaint Form

Submit this form within 180 days following the date of the alleged discrimination to the Director at the above address.

### Section I

Name \_\_\_\_\_

Mail address \_\_\_\_\_

City \_\_\_\_\_ ST \_\_\_\_\_ Zip \_\_\_\_\_

Phones: Home \_\_\_\_\_ Work \_\_\_\_\_

Email address \_\_\_\_\_

Accessible format required? ☐ Audio ☐ Large print ☐ TDD ☐ Other \_\_\_\_\_

### Section II

Are you filing this complaint on your own behalf? ☐ Yes\* ☐ No

\*If you answered "yes" to this question, go to Section III.

If "no", please supply the name and relationship of the person for whom you are complaining:

Name \_\_\_\_\_ Relationship \_\_\_\_\_

Please explain why you are filing for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

☐ Yes ☐ No

### Section III

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination: Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who you believe discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use separate paper and attach to this form.



**Section IV**

Have you previously filed a Title VI complaint with this agency?

\_\_\_\_ Yes\*      \_\_\_\_ No

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

\_\_\_\_ Yes      \_\_\_\_ No

If "yes", check all that apply.

\_\_\_\_ Federal Agency    \_\_\_\_ State Agency    \_\_\_\_ Local Agency

\_\_\_\_ Federal Court    \_\_\_\_ State Court

Please provide information about a contact person at the agency/court where the complaint was filed.

Name \_\_\_\_\_ Title \_\_\_\_\_

Agency \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ ST \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_

**Section VI**

Name of agency complaint is against \_\_\_\_\_

Contact person \_\_\_\_\_ Title \_\_\_\_\_

Phone \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date **required** below.

Signature \_\_\_\_\_ Date \_\_\_\_\_

## APPENDIX C

### Investigations, Lawsuits and Complaints Document

<b>List of Investigations, Lawsuits and Complaints</b>	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color or national origin)</b>	<b>Status</b>	<b>Action(s) taken</b>
<i>Investigations</i>				
1.				
<i>Lawsuits</i>				
1.				
<i>Complaints</i>				
1.				

**APPENDIX D**  
**Summary of Outreach Efforts**  
**Past, Present and Future**

1. Notice to the public:

- Notice of Opportunity for Public Hearing (as in the case of ATP)
- Notice of Public Meeting/Hearing/Comments (as in the case of transit service and fare changes)

Notices are posted at City of Annapolis' website; placed in all local libraries, city hall, assisted living homes; Arundel Lodge (which caters for the disabled populations)

On the buses, notices are handed out to riders as they board the buses

2. Signs on Transit Vehicles and bus stops

3. Email blast (subscribers to myannapolis.gov)

4. Notices at agencies/offices that serve minority populations (e.g. Center of Help that caters for the Spanish population in Annapolis, churches

5. Direct mail to community organizations such as Center of Help, churches,

6. Radio, television, or newspaper ads

7. Informal group meetings with neighborhood associations, advocacy groups, etc

**APPENDIX D**  
**Sample Public Outreach Materials**



*City of Annapolis*

**DEPARTMENT OF TRANSPORTATION**

308 Chinquapin Round Road, Annapolis, Maryland 21401

Phone: 410-263-7964 410-263-7994 Fax: 410-263-4508 Internet: [transit@annapolis.gov](mailto:transit@annapolis.gov)

ACTING DIRECTOR, KWAKU AGYEMANG-DUAH, PH.D.

March 3, 2010

**Annapolis Transit Development Plan  
Public Review/Comments**

The Transit Development Plan (TDP) for the City of Annapolis is a short-range plan required by MTA to serve as a basis for reviewing the annual grant applications from Annapolis Transit and other locally operated transit systems. The Plan is an independent management, financial, service study and audit of Annapolis Transit. It includes analysis of transportation routes and services including changing the ways transit services are provided.

The TDP was prepared by KFH Consulting Group, Inc. with financial support from the Maryland Transit Administration (MTA). A Citizen Advisory Committee (CAC) was formed to provide input to the planning process.

On April 1, 2010, there will be a presentation on the plan and a public hearing before the Annapolis Planning Commission. This meeting will take place at 7:30 p.m. in the City Council Chambers.

The department will accept public comments on this Plan until April 1, 2010. Comments may be mailed to: Attention: Kwaku Agyemang-Duah, 308 Chinquapin Round Road, Annapolis, MD 21401 or via email to: [transit@annapolis.gov](mailto:transit@annapolis.gov) and put "2010 Transit Development Plan" in the subject area.



*City of Annapolis*

**DEPARTMENT OF TRANSPORTATION**

308 Chinguapin Round Road, Annapolis, Maryland 21401

Phone: 410-263-7964 410-263-7994 Fax: 410-263-4508 Internet: [transit@annapolis.gov](mailto:transit@annapolis.gov)

ACTING DIRECTOR, KWAKU AGYEMANG-DUAH, PH.D.

August 30, 2010

Re: Annapolis Transit System Change

Dear Sir/Madam

I am pleased to inform you that Annapolis Transit is preparing to make modifications to the transit system. In an effort to improve the quality of transit service, on October 2, 2010 the route structure will change from the existing pulse type system to an arterial system.

The arterial route structure will have a number of transfer options including four major transfer points at Westfield Shopping Mall, Eastport Plaza, Downtown Annapolis and Annapolis Market (Safeway on Forest Drive). We anticipate that the new system will:

- significantly improve the quality of transit services in Annapolis;
- improve service through progressive route modifications and increases in service frequency and span to make transit attractive and usable;
- improve transit connectivity through local and regional services;
- provide transit infrastructure improvements to support continued growth in transit services.

Information on new bus route schedules, new system and individual route maps will be available approximately two (2) weeks prior to October 2, 2010. The information will be available:

- on the buses;
- at the City's website at [www.annapolis.gov/transportation](http://www.annapolis.gov/transportation); and
- at the Department of Transportation.

Should you have any questions or comments please do not hesitate to contact me at 410-263-7964.

Sincerely,

Kwaku Agyemang-Duah  
Acting Director



## PUBLIC NOTICE

### PROPOSED TRANSIT SERVICE CHANGES

**Annapolis Transit** requests your attendance at a public hearing on the following proposed options for transit service changes. You may submit any comments you may have in writing to *Transit Service Changes, 308 Chinquapin Round Rd, Annapolis, MD 21401* or *kad@annapolis.gov*. Let us hear from you – in person or in writing.

#### DATE/TIME/PLACE:

**Date:** Wednesday, July 30, 2014

**Time:** 7 p.m.

**Place:** Annapolis City Hall Council Chamber, 160 Duke of Gloucester Street, Annapolis, MD

#### *Option 2 - Eliminate:*

***Brown C; one (1) bus on Gold Circulator route***

#### *Option 3 - Eliminate:*

***Gold, Yellow and Circulator routes***

Public Transportation: *The location of the meeting is accessible by Annapolis Transit (Green and Circulator routes)*

#### POTENTIAL IMPACTS OF PROPOSED SERVICE ADJUSTMENTS

#### SUMMARY OF PROPOSED CHANGES

*The following service reduction options are being considered for Annapolis Transit due to budgetary constraints:*

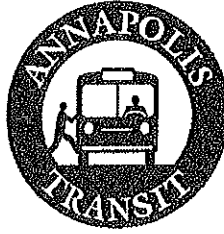
#### *Option 1 - Eliminate:*

***Brown C; one (1) bus on Gold route; and one bus on Circulator route and reduce length of Circulator route and service hours***

Potential impacts range from gap in transit service between Edgewater and the community college in Arnold to reduction in parking revenue and service frequency.

---

For more information or questions, contact:  
Annapolis Department of Transportation  
410-263-7964  
[www.annapolis.com/transportation](http://www.annapolis.com/transportation)



## PROPUESTA DE CAMBIOS EN LAS TARIFAS Y SERVICIO DEL TRANSPORTE PUBLICO

**El Departamento de Transporte de la Ciudad de Annapolis** sugiere su participación en la audiencia pública sobre la propuesta de cambios en las tarifas y servicio del transporte público. Puede mandar por escrito sus comentarios a: *Transit Service Changes, 308 Chinquapin Round Rd, Annapolis, MD 21401* o por el correo electrónico *transit@annapolis.gov*. Por favor, déjenos saber su opinión – en persona o por correo.

### FECHA/LUGAR/HORA:

**Fecha:** Miércoles 30 de Julio de 2014

**Hora:** 7 p.m.

**Lugar:** Alcaldía de Annapolis - Council Chamber, 160 Duke of Gloucester Street, Annapolis, MD

Transporte Público: *Puede llegar al lugar de la reunión usando el servicio de transporte público de Annapolis (Rutas "Green y Circulator")*

### RESUMEN DE LA PROPUESTA DE CAMBIOS

#### OPCION 1

a. Reducción de las **horas de servicio** de las rutas "Gold y Circulator"

b. Reducción en la **frecuencia del servicio** de las rutas "Gold, Circulator y Brown"

c. Reducción en la **duración de las rutas** del "Circulator"

d. Cargo **básico en la tarifa de una vía de \$1.00** en la ruta del "Circulator"

e. Incremento en el **cargo de la tarifa de una vía** en las rutas "Gold y Yellow" de \$2.00 a \$3.00

f. Reducción del **servicio de autobuses en días feriados**

#### OPCION 2

**Eliminación de las Rutas "Gold, Yellow y Circulator"**

### CONSECUENCIAS POTENCIALES

**Option 1:** Incremento en el tiempo de espera en algunas rutas.

**Option 2:** Brecha en el servicio de transporte público en "Riva Road" y entre Edgewater y el "Community College" ubicado en Arnold; además de una reducción en ingresos de los aparcamientos.

Para mayor información, por favor comuníquese con el:

Departamento de Transporte de Annapolis  
**410-263-7964**

[www.annapolis.com/transportation](http://www.annapolis.com/transportation)



**APPENDIX E**

**LANGUAGE ASSISTANCE PLAN (LAP) FOR**

**PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

**Assessment of Needs and Resources**

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

**Factor 1:     Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population**

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

**U.S. Census Data – American Community Survey (2008-2012)**

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by Annapolis Department of Transportation's service area. The Annapolis Department of Transportation Annapolis Transit's service area includes a total of 5,537 persons (5.59% of the total population) with Limited English Proficiency (those persons who indicated that they spoke English "not well," and "not at all" in the 2008-2012 ACS Census).

Information from the 2008-2012 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Limited English Proficiency (LEP) populations in Annapolis Department of Transportation service area \***

	Persons	Percent
<b>Total Population</b>	99,080	
<b>LEP population</b>	5,537	5.59%
<b>Five Largest LEP populations</b>		
Spanish or Spanish Creole	3,846	3.88%
Korean	294	0.30%
Tagalog	185	0.19%
Urdu	164	0.17%
Chinese	161	0.16%

\*ADOT service area defined as the following Census Tracts: 24003750900, 24003706500, 24003701101, 24003706402, 24003750804, 24003740102, 24003702402, 24003730901, 24003702602, 24003702601, 24003701102, 24003730800, 24003702500, 24003706700, 24003706600, 24003731103, 24003740103, 24003706401, 24003706101, 24003750801

Data from American Community Survey 2012 5-year estimates.

It is noted that there are relatively high number of LEP persons in the service area (Figure E-2). Spanish or Spanish Creole language is spoken by 3,846 persons in the LEP population. As this represents 3.88% or more than 1,000 LEP persons of the total population in the service area, the City of Annapolis Department of Transportation has and will continue to translate vital documents as detailed in this LAP Plan.

**Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System**

Annapolis Department of Transportation reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Contact with transit operation manager;
- Calls to Annapolis Department of Transportation's customer service telephone line;

- Visits to the agency's administrative building;
- Attendance at public hearings hosted by Annapolis Department of Transportation;

The most common questions received from LEP persons are (a) whether there will be transit services on holidays and (b) time of arrivals of buses when holiday schedules are in effect. The agency has been very successful in providing responses to these questions because some of the bus drivers speak the most common LEP language in Annapolis, which is Hispanic.

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact.

#### **Information from Community Organizations that Serve LEP Persons**

To supplement the Census, education, and labor department data, Annapolis Department of Transportation conducted community outreach to the following organizations that work with LEP populations. Community outreach is done via telephone calls and presentations about proposed service/fare changes to organizations that serve LEP persons. The following organization has been contacted in the agency's outreach efforts: Center of Help/Centro de Ayuda, 1906 Forest Drive, Suite 2B, Annapolis. The methods of contact are telephone and visits.

#### **Factor 3:     Assessment of the Nature and Importance of the Transit Services to the LEP Population**

The Annapolis Department of Transportation (ADOT) provides fixed route and ADA paratransit complementary services to meet the mobility needs of LEP persons who are transit-dependent. Access to jobs, medical and social services are important to the quality of life of LEP individuals in the service area. Annapolis Department of Transportation provides that access.

Based on past experience serving and communicating with LEP persons we learned that the fixed route transit service is currently of particular importance LEP persons in the community.

The following are the most critical services provided by ADOT for all customers, including LEP persons.

- Fixed route transit services
- ADA paratransit services

#### **Factor 4: Assessment of the Resources Available to the Agency and Costs**

Currently, Annapolis Department of Transportation uses city staff in providing language assistance to LEP persons. City departments with such in-kind language assistance include the Annapolis Police Department, the Mayor's Office, Finance and Transportation departments.

#### ***Feasible and Appropriate Language Assistance Measures***

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time: use of bilingual city staff for oral communications with LEP persons and translation of vital documents into Spanish language, the dominant language for LEP persons.

#### **LEP Implementation Plan**

Through the four-factor analysis, Annapolis Department of Transportation has determined that the following types of language assistance are most needed and feasible: translation of System Map and Ride Guide into Spanish.

#### ***Staff Access to Language Assistance Services***

Agency staffs who come into contact with LEP persons can access language services by, *transferring a call to bilingual staff*. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

#### ***Responding to LEP Callers***

Staff who answer calls from LEP customers transfer the call to a bilingual staff.

#### ***Responding to Written Communications from LEP Persons***

When responding to written communications from LEP persons, bilingual staff from within the agency or from another city department is used.

#### ***Responding to LEP Individuals in Person***

LEP person who visits our customer service and administrative office is assisted by bilingual operating staff.

The following procedures are followed by operators when an LEP person has a question on board Annapolis Department of Transportation vehicle: *bilingual operating staff, referral to telephone assistance, volunteer translation assistance from fellow passengers.*

### ***Training***

All Annapolis Department of Transportation staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive refresher training on policies and procedures related to assisting LEP persons as needed. This training will be offered by bilingual city staff.

### ***Providing Notice to LEP Persons***

LEP persons are notified of the availability of language assistance through the following approaches: *[List items such as:*

- *following our Title VI policy statement included on our vital documents.*
- *on our website, with links to translations of vital documents in other languages.*
- *through signs posted on our vehicles and in our customer service and administrative offices.*
- *through ongoing outreach efforts to community organizations, schools, and religious organizations.*
- *staffing a table with bilingual staff at community service events of interest to LEP groups.*

LEP persons will also be included in all community outreach efforts related to service and fare changes.

### ***Monitoring/updating the plan***

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Annapolis Department of Transportation will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, focus groups, community meetings, internal meetings with staff who assist LEP persons, review of updated Census data, formal studies of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

Based on the feedback received from community members and agency employees, Annapolis Department of Transportation will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Annapolis Department of Transportation will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Annapolis Department of Transportation will strive to address the needs for additional language assistance.

**APPENDIX G**  
**Annapolis Department of Transportation**  
**Annapolis Transit**  
**Title VI System Service Standards and Policies**

**Introduction**

Annapolis Department of Transportation (ADOT) is committed to providing the highest possible level of reliable, safe, affordable, convenient and accessible public transportation services to all the people who visit, live and work in its service area. The public transportation services are provided through regular fixed route (connectors), shuttle and demand-response, ADA complementary paratransit services.

The connectors consist of the following fixed routes: Red, Yellow, Green, Orange, Gold and Purple. The shuttle services are provided through the Circulator and State Shuttle. The headways on the connectors are 30 minutes except the Brown, Purple and Gold routes which have 45, 75 and 120 minutes respectively. ADOT runs a reduced service on weekday evenings, Saturdays and Sundays. Weekday span of service is 5:30 a.m. to 11:00 p.m.; Saturday from 7:15 a.m. to 8:00 p.m., and on Sunday from 7:00 am to 8:00 p.m.

The ADA complementary paratransit is a specialized, origin to destination service for people with disabilities who are not able to ride fixed-route public transportation. This is a curb-to-curb service for persons with disabilities within  $\frac{3}{4}$  mile on each side of each fixed route.

The service area is about 23 square miles including the City of Annapolis and surrounding Anne Arundel County areas, from Bay Forest Plaza in the east to Gateway Village and Annapolis Mall in the west; and Sojourner Douglas College in Edgewater in the south to Anne Arundel Community College in Arnold in the north. (Figures E-1, E-2, E-3 and E-4)

The following standards and policies address how Annapolis Department of Transportation's fixed route services are distributed across the system, and they ensure that service design/operations do not result in discrimination based on race, color, or national origin. The standards and policies fulfill the requirements set out in FTA Circular 4702.1B "Title VI Requirements and Guidelines for FTA Recipients."

**Service Standards**

Per FTA Circular 4702.1 B, the following service standards are required: vehicle load, vehicle headway, on-time performance, and service availability.

***Vehicle Load***

Vehicle load is a ratio of the number of passengers on a bus to the total number of seats. Vehicle loads greater than 100 percent indicate standees, and may begin to impact passenger comfort and safety. The ADOT vehicle fleet includes vehicles with varying seating and standee limitations; however the standards below apply to all vehicle types.

	<b>Bus (Connectors)</b>	<b>Bus (Shuttles)</b>
Peak	120% maximum average	120% maximum average
Off Peak	100% maximum average	100% maximum average

***Vehicle Headway***

Vehicle headway is the amount of time between two vehicles on a route, measured in minutes and stated in published schedules. Headway is related to frequency; the shorter the vehicle headway, the more frequent the service. Within the system, current headways range from 30-120 minutes on connector routes and 20 minutes on shuttle routes. These headways are based on population density and demand for service.

	<b>Bus (Connectors)</b>	<b>Bus (Shuttles)</b>
Peak	120 minutes maximum	20 minutes maximum
Off Peak	120 minutes maximum	20 minutes maximum

***On-Time Performance***

On-time performance is a measure of dependability and schedule adherence, based on the percentage of runs completed as scheduled. ADOT defines its "on-time" window as 0 to 5 minutes late, with no vehicle leaving a time point early. On-time performance will be determined at origins, destinations, and specific time points on each route. On-time performance is measured by regular random checks performed and recorded by dispatchers. If it is determined that a driver is ahead of schedule, the manager is notified and a meeting is set with the driver to discuss necessary improvement.

	<b>Bus (Connector)</b>	<b>Bus (Shuttles)</b>
Percent on time	85%	85%



### ***Service Availability***

Service availability refers to the distribution of routes within ADOT's service area. ADOT's service area varies in population density and land use patterns, and thus necessitates a range of transit services. Service availability can be measured by both the distance between bus stops (stop spacing) and the percentage of residents within a certain distance of a route or stop (population coverage). Stop Spacing impacts the average speed of service, creating a tradeoff of maximizing availability and maintaining reasonable travel times. Likewise, offering coverage to as many residents as possible must be balanced with the priority of serving high ridership areas more frequently.

	<b>Bus (Connectors)</b>	<b>Bus (Shuttles)</b>
Stop Spacing	Maximum of every $\frac{1}{4}$ to $\frac{1}{2}$ miles within the Annapolis area as safety permits and where the speed limit is less than 40 mph	As needed

### **Service Policies**

Per FTA Circular 4702.1B, the following service policies are required: transit amenities and vehicle assignment.

#### ***Distribution of Amenities***

Transit amenities are "items of comfort, convenience, and safety" available to riders. They include but are not limited to: seating, shelters/canopies, information (signs, maps, schedules, digital displays), and trash receptacles. The distribution of amenities throughout the system is generally a function of ridership. ADOT will distribute transit amenities equitably throughout the service area based on boarding levels. It will prioritize major transfer points and stops along multiple routes (Figure 1, Bus Shelter Location Map below)

#### ***Vehicle Assignment***

Vehicle assignment is the process by which vehicles are placed into service throughout the system. ADOT vehicle fleet includes a range of vehicle ages. Currently, there are twenty-two (22) service vehicles and all are equipped with on-board video surveillance system. The fleet mix is as follows:

29-30-foot, Heavy Duty Buses: 19 buses

9 Gillig buses

1 Gillig Hybrid Bus

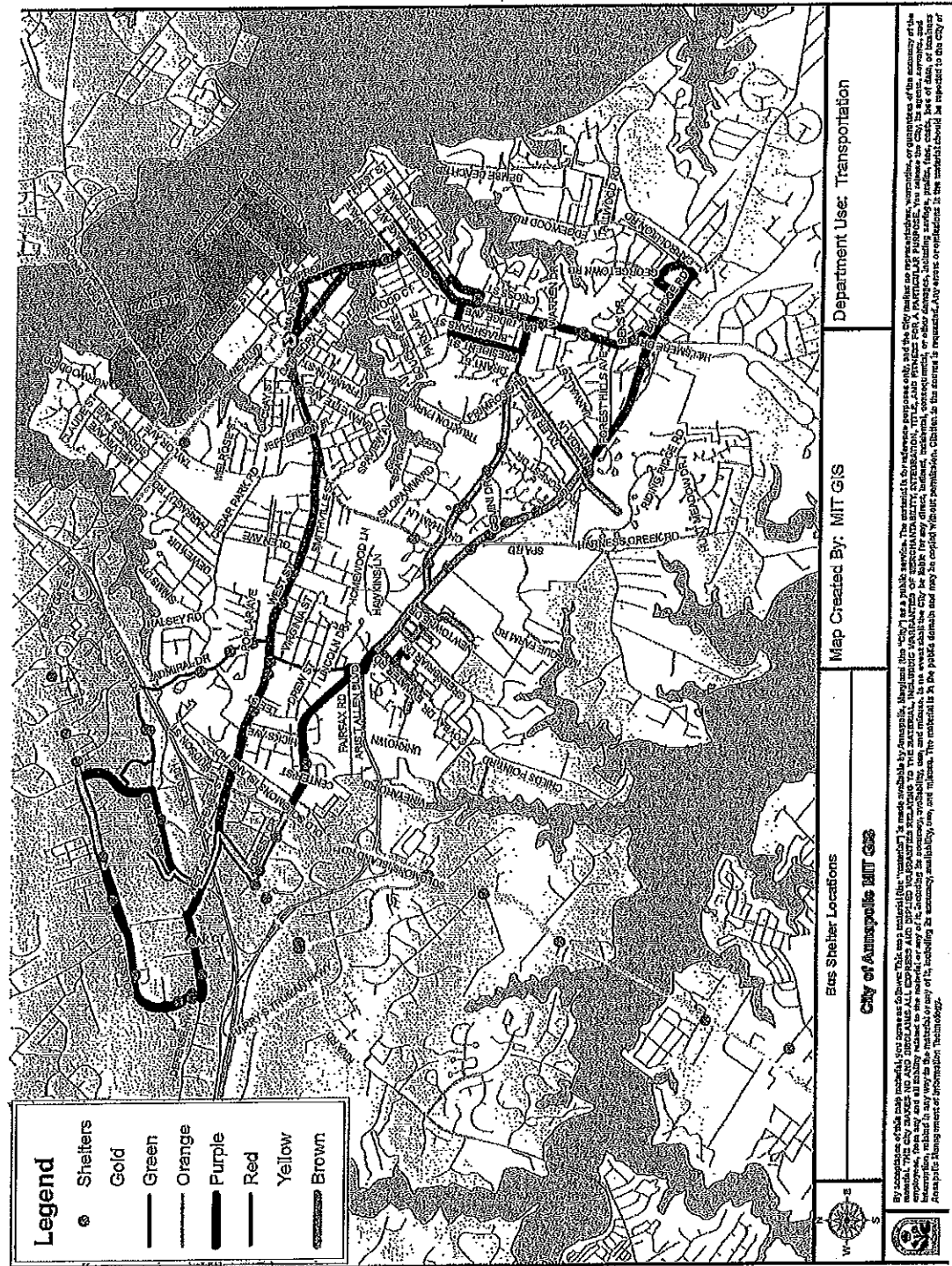
4 Cable Car Concept Trolleys

3 Nabi Trolleys

2 Optima buses

Small Buses: 3 Cutaways

**Figure 1. Bus Shelter Location Map**



All service vehicles are equipped with wheelchair ramps/lifts. All service vehicles except four (4), Cable Car Concept trolleys are equipped with bike racks. Vehicles are assigned to routes based on ridership demand.

All service vehicles are of a similar seating size and features and so are assigned at random, without regard to age or service area. Cutaway type vehicles are used for ADA paratransit service (Table 1. Vehicle Pull-out on Selected Days)

**Table 1. Vehicle Pull-out on Selected Days**

Route Name	1/6/2014 Fleet #	1/14/2014 Fleet #	12/12/2014 Fleet #	2/9/2015 Fleet #	2/23/2015 Fleet #	3/2/2015 Fleet #	3/19/2015 Fleet #
Red A	302	300	2312	5311	5311	5109	2312
Red B	5311	5409	5311	5111	5109	5311	5111
Yellow	5409	5311	5411	5409	5409	5409	5409
Green A	5411	5409	300	5511	5309	5411	5511
Green B	6011	5511	4311	5411	5511	5109	5511
Orange	5309	5209	5309	5309	5411	5309	5309
Gold A	2212	2212	5109	2212	2212	2212	2212
Gold B	2312	2312	2212	-----	-----	-----	-----
Brown A	5211	5211	5209	300	5209	2312	5211
Brown B	5209	5309	302	5211	5211	5211	5209
Brown C	5109	5109	-----	-----	-----	-----	-----
Purple North	5311	5211	-----	5111	5311	5109	5209
Purple South	5209	5209	5209	5311	5209	5311	5511
Circulator 1	254	254	251	251	251	251	254
Circulator 2	251	251	-----	-----	-----	-----	-----
State Shuttle	4311	253	4311	254	254	400	4311
Paratransit	2112	2112	2112	2112	2112	2112	2112

----- No longer in service due to service reductions